foodiverse

Code of Ethics



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01

Our Code of Ethics

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Foodiverse is a European industrial platform specialized in Fresh Convenience, with family roots, agricultural integration, production presence in several countries and a long-term vocation.

From field to point of sale, we work to offer fresh, healthy, safe and sustainable solutions, creating added value for our customers, our people, our suppliers, our shareholders and society.

This Code of Ethics **sets out the principles, values and standards** of conduct that must guide our decisions and behaviour within all of the companies that make up Foodiverse.

It is a common reference for acting with integrity, responsibility, transparency and respect that, as added value does, it strengthens stakeholders' trust in Foodiverse and in the way we do business.



Mission

Foodiverse is focused on **leading the evolution of Fresh Convenience in Europe as an industrial** platform, combining agricultural integration, operational excellence and continuous innovation to offer fresh, healthy, safe and ready-to-eat solutions.

Vision

We aim to promote **healthier and more sustainable eating in Europe,** creating long-term value for customers, consumers, shareholders, professionals, suppliers and communities, and generating a positive impact on our environment.

Strategy

Our strategy is based on **growing responsibly as a European Fresh Convenience platform.** To do so, we combine a European vision and local management, agricultural integration, product and category innovation, industrial excellence, food safety, collaboration with customers and suppliers, operational efficiency and sustainability all the way along the value chain.



Profitability is something indispensable when it comes to investing, innovating, generating quality employment, reducing our environmental impact and ensuring the continuity of the project in the long term.

Our Identity and Values

At Foodiverse, we have a shared work culture based on:



Innovation
We drive new solutions that anticipate the needs of the market and consumers.

Operational excellence
We seek efficiency, quality, food safety and continuous improvement in every process.

Integration and collaboration
We work as a team with customers, suppliers and partners, building stable, long-term relationships.

Commitment and responsibility
We act with honesty, rigor and respect for people, the product, resources and the environment.

Safety and orderliness culture (HOLD)
We maintain demanding standards of hygiene, order, cleanliness, operational discipline and prevention.

Entrepreneurial spirit
We promote initiative, adaptation to change and the constant search for better solutions.

02

Objectives

Objectives

The purpose of the Code of Ethics is to establish a **common framework of conduct for all people and companies that make up Foodiverse**, as well as for those who collaborate and/or interact with Foodiverse, where applicable.



It is an essential part of our compliance and good corporate governance model and **helps prevent legal, ethical, social, labor, environmental and reputational risks.**

The Code reflects our **commitment to business ethics and good governance, transparency, human rights, food safety, sustainability, fair competition, prevention of corruption, creation of sustainable value and compliance with the law** during our day-to-day activity.

03

Scope of Application

Scope of Application

This Code is **mandatory for all people who work at Foodiverse,** regardless of their company, country, workplace, function, hierarchical level or contractual arrangement. This includes employees, managers, directors and members of governing bodies.



It also **provides guidelines for the relationship with customers, suppliers, partners, advisers, subcontractors and other third parties** with whom Foodiverse interacts, especially when they act on behalf of Foodiverse or participate in activities relevant to our value chain.

Those who lead teams have an additional responsibility: to communicate the Code of Ethics, promote compliance with it, resolve doubts, act with an exemplary nature and not tolerate any behaviour contrary to its principles.

Failure to comply with the Code of Ethics may result in disciplinary, contractual or legal measures, proportionate to the seriousness of the facts and in accordance with the applicable regulations in each country.

04

Compliance Monitoring

Compliance Monitoring

Foodiverse has a compliance model aimed at **preventing, detecting and managing legal and ethical risks,** including, among others, corruption, bribery, fraud, conflicts of interest, competition, human rights, food safety, data protection, confidential information and sustainability.



The Compliance Officer coordinates the implementation and monitoring of the Code of Ethics, promotes training and controls, receives queries and notices , and manages investigations in accordance with the internal procedure.

The Ethics and Conduct Committee interprets the Code, supports its application within the different businesses and countries, supervising relevant incidents and escalating matters to Management as appropriate.

The different General Management teams, the Management Committee and the heads of each area must **actively promote a culture of integrity, transparency and responsibility.**

05

Ethical Principles

Ethical Principles

1

Legality and regulatory compliance.

We comply with the laws, regulations, internal policies and applicable standards in **all countries in which we operate.**



Ethical Principles

2

Integrity, honesty and consistency.

We act with **transparency, rigor and good faith.** We do not seek results at any price and reject any practice that could jeopardize trust in Foodiverse.



Ethical Principles

3

Human and labour rights.

We respect internationally recognized human rights, the principles of the United Nations Global Compact, the fundamental ILO conventions and Sustainable Development Goals. **We reject child labour, forced labour, human trafficking, discrimination, harassment and any degrading treatment.**



Ethical Principles

4

Responsibility and sustainability.

We integrate social, environmental and governance criteria into our decisions, focusing on **quality employment, safety, resource efficiency, impact reduction, circular economy, food safety and responsible relationships** with our supply chain.



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06

Workplace Policies and Professional Conduct

Ethical Principles

We promote a fair, competitive remuneration policy consistent with the market and sector, the responsibility of the position, performance and applicable legislation.



Our aim is to support the **attraction, development and retention of talent,** ensuring internal equity, transparency and non-discrimination criteria.

Equality, Diversity and Non-Discrimination

We guarantee **equal treatment and equal opportunities and reject any form of discrimination** based on sex, race, origin, nationality, religion, age, disability, sexual orientation, gender identity or expression, marital status, opinion, association, family situation or any other condition protected by law.



We do not tolerate harassment, violence, abuse of authority, retaliation or any behaviour that creates an intimidating, offensive, humiliating or hostile environment.

We respect the exercise of the rights to freedom of association, trade union freedom and collective bargaining, in accordance with the applicable regulations in each country, while maintaining a position of neutrality.

We promote an inclusive, safe and collaborative culture in which every person can contribute, develop and be treated with dignity.

Work-Life Balance

We promote measures that support **balance between professional, personal and family life,** compatible with the organizational, production and service needs required by the fresh convenience business (freshness).



We seek to make professional development **compatible with well-being, co-responsibility and respect for the personal lives of our personnel.**

Privacy, Data Protection and Responsible Use of Personal Information

We respect privacy and protect the personal data of professionals, customers, suppliers, consumers and other third parties. **We process data lawfully, fairly, transparently, limited to the intended purpose, securely and in accordance with applicable regulations.**

We only access, use or disclose personal data when we are authorized to do so and when it is necessary for our functions. **We maintain confidentiality even after the employment or professional relationship with Foodiverse has ended.**



Any incident, loss, unauthorized access or improper use of data must be reported immediately through the established internal channels to our DPO and the IT manager.

Occupational Health and Safety

The health and safety of people is a non-negotiable priority. We are committed to identifying, assessing and preventing occupational risks, maintaining safe facilities, training teams and encouraging responsible behaviour.

Each professional must comply with safety rules, use equipment correctly, report risky situations and contribute to a clean, orderly, hygienic and safe working environment.



In our food operations, **hygiene, order, operational discipline, prevention and safety culture (HOLD)** are essential conditions to protect people, the product and safeguard the trust of our customers and consumers.

Training and Professional Development

We believe that Foodiverse's growth begins with its people. **We promote training, professional development, mobility, versatility, continuous improvement and the transfer of knowledge among teams, countries and businesses.**

We foster a culture of comparative information sharing, feedback between managers and team members, learning, recognition of effort and development of internal talent.



Participation in academic, scientific, sectoral or informative activities must be compatible with professional responsibilities, respect confidentiality as well as having prior authorization when carried out on behalf of Foodiverse or during working hours.

Gifts, Hospitality and Invitations

We do not offer, request or accept gifts, invitations, favours, perks or benefits that may influence, appear to influence or jeopardize the objectivity of a professional decision.

Only courtesy items of symbolic value that are reasonable, occasional, transparent, lawful, in line with accepted business practices and that do not create an obligation or expectation of consideration may be accepted or given.

Facilitation payments, improper commissions, gifts in cash or cash equivalents, and any attention to authorities or public officials that could be interpreted as an attempt to influence are prohibited.



The acceptance of courtesy items or any doubts that may arise in this regard **must be consulted in advance with the hierarchical superior,** the Compliance Officer or the Ethics and Conduct Committee.

Conflicts of Interest

We must always act in the interest of Foodiverse, preventing personal, family, economic or third-party interests from influencing our decisions.

A conflict of interest may be considered to exist in family or personal relationships with suppliers, customers or competitors, external activities, financial interests, business opportunities, by hiring relatives (family members or friends) or with the use of Foodiverse assets for private purposes.



Actual, potential or apparent conflicts must be reported immediately and transparently to the hierarchical superior and to the Compliance Officer for analysis and management. The existence of a conflict does not necessarily imply an infringement but concealing it may do so.

Information Management and Confidential Information

We protect confidential, strategic, commercial, financial, technical, industrial, agricultural, innovation-related, customer, supplier, employee and third-party information. We use it only for legitimate business purposes and within the scope of our functions.

We do not share confidential information with unauthorized individuals, inside or outside Foodiverse, unless expressly authorized or legally required.

We apply physical and digital security measures, use IT systems properly, **avoid unauthorized access and report any suspicion of leakage, loss or misuse to the DPO and the IT manager.**



The duty of confidentiality remains after the relationship with Foodiverse has ended.

Inside Information

Non-public, relevant or strategic information belonging to Foodiverse must be treated with special confidentiality. No one may use it for their own benefit or that of third parties or share it with unauthorized individuals.



Privileged or sensitive information includes, among others, information relating to results, corporate transactions, acquisitions, investments, customers, prices, suppliers, innovations, contracts, litigation, personal data, food safety or any matter that could directly or indirectly affect Foodiverse in a relevant way if improperly disclosed.

Professional Loyalty and Use of Company Assets

We use Foodiverse resources responsibly, austerely, efficiently and for professional purposes. We protect its tangible and intangible assets, including facilities, equipment, systems, brands, intellectual property, information, knowledge, working time and financial resources.

Foodiverse positions itself as a highly competitive company, so expenses must be necessary, appropriate, proportionate, justified and in line with a demanding and mandatory budgetary model. The use of Foodiverse resources for unauthorized private purposes, unlawful activities or interests unrelated to Foodiverse is not permitted.



We respect the intellectual and industrial property of Foodiverse and third parties, use Foodiverse's image and brands only with authorization and prioritize Foodiverse's interests in business opportunities linked to our activity.

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Relationships

Relations with Shareholders and Good Corporate Governance

We promote a relationship with shareholders based on the principles of **transparency, rigor, loyalty, equal treatment and creation of sustainable long-term value.**

Economic, financial and non-financial information must faithfully reflect the reality of Foodiverse and allow appropriate decision-making.

Profitable growth must be compatible with regulatory compliance, **sustainability, responsible risk management and respect for commitments** made to stakeholders.



Relations with Authorities and Public Administrations

We interact with authorities, regulatory bodies and public administrations in a **transparent, respectful, collaborative and lawful manner.**

All communications, inspections, requests for information or administrative proceedings must be managed **rigorously, truthfully and exclusively by the responsible areas.**



Foodiverse **does not make contributions to political parties, candidates, authorities or public institutions** on behalf of Foodiverse companies. Any institutional representation activity must be authorized and documented.

Relations with Customers and Consumers, Quality and Food Safety

Food safety, quality, freshness and consumer trust are essential principles for Foodiverse.

We work with retail and foodservice customers as strategic partners, developing solutions adapted to each market and channel, with a focus on innovation, traceability, excellent service, operational efficiency and compliance with the most demanding standards.

We ensure that the information, labeling, communication and presentation of our products is truthful, clear, complete and not misleading.



Any risk or incident that may affect the safety, quality or legality of a product **must be reported immediately and managed as an absolute priority.**

Relations with Suppliers and the Supply Chain

We select and evaluate suppliers using objective criteria of **quality, safety, service, competitiveness, ethics, legal compliance, human rights, occupational safety, environmental impact and sustainability.**

We expect our suppliers and subcontractors to share the principles of this Code of Ethics, comply with applicable legislation, avoid child and forced labour, guarantee decent working conditions, not discriminate, protect the health and safety of their workers, be up to date with their obligations withpublic authorities, **act against corruption and responsibly manage their environmental impact.**

Agricultural integration and collaboration with producers are key to ensuring quality and traceability, origin control, continuity of supply and responsible practices from the field.



Suppliers' commercial information is confidential. **Purchasing decisions must be made with objectivity, transparency, absence of conflicts of interest and respect for free competition.**

Relations with Competitors

We compete fairly, independently and in accordance with competition law in all markets in which we operate.

We do not participate in agreements, exchanges of sensitive information, arranged practices, market sharing, price fixing, output limitation, bid rigging or any conduct that may restrict competition.

We respect the intellectual and industrial property of competitors and third parties. Information about the market and competition must be obtained by means of lawful, ethical and transparent means.



Market Relations and Communication

The financial, non-financial, commercial, environmental, social and governance information that Foodiverse communicates to the market must be **truthful, complete, understandable, traceable and consistent with the reality of Foodiverse.**

External communication, including media, social networks, events, industry associations and publications, must be coordinated with the responsible areas and respect confidentiality, data protection, competition and corporate reputation.

No professional may speak on behalf of Foodiverse unless authorized to do so.



Relations with Society and Communities

We aim to generate a positive impact in the communities where we operate, contributing to **local employment, training, inclusion, economic activity, healthy** eating and collaboration with social organizations.

Our **collaboration, donation or sponsorship** actions must be consistent with our values and be authorized, documented and monitored by the corresponding departments.

We reject corruption, fraud, extortion, bribery, money laundering and any irregular practice in **relationships with customers, suppliers, competitors, authorities or third parties.**



Payments and collections must be made through traceable means, in accordance with applicable legislation and internal policies.

Environment, Sustainability and Circular Economy

We integrate sustainability into the way we operate and into **the continuous improvement of our processes, from field to point of sale.**

We undertake to comply with environmental legislation, prevent pollution, **use water, energy, raw materials and materials efficiently, reduce emissions, minimize food waste, improve packaging,** promote recyclable solutions and advance circular economy through the recovery of waste and by-products.

In the field, **we promote responsible practices** focused on traceability, origin control, water efficiency, nutritional control of crops and the progressive reduction of inputs where feasible.

In industrial operations, we work to **reduce consumption, optimize logistics, measure environmental** performance and continuously improve our indicators.



Responsible Innovation

Innovation is an essential part of Foodiverse.

We develop products, processes, formats, recipes and Fresh Convenience solutions that respond to the needs of customers and consumers, balancing taste, nutrition, food safety, industrial viability, efficiency and sustainability.

Innovation must be carried out with technical rigor, respect for the law, protection of intellectual property, confidentiality, truthful information and responsible assessment of risks for consumers, customers, operations and reputation.



08

Reporting Misconduct and Ethics Reporting Channel

Reporting Misconduct and Ethics Reporting Channel

All parties subject to this Code of Ethics have **a duty to report, in good faith, any fact, indication or reasonable suspicion of legal or ethical non-compliance or breach of internal policies.**

Foodiverse provides communication and reporting channels, including the ethics channel or whistleblowing channel, which allow doubts, queries or reports about possible irregularities to be raised. **Reports will be managed by the Compliance Officer, ensuring confidentiality, objectivity, independence,** respect for the presumption of innocence and protection of the rights of all individuals involved.

Any retaliation, threat or unfavourable treatment against anyone who reports a possible irregularity in good faith or collaborates in an investigation is prohibited.



To ensure this, the whistleblowing channel has a system that guarantees the informant's anonymity.

Reporting Misconduct and Ethics Reporting Channel

If the report concerns the Compliance Officer or a member of the Ethics and Conduct Committee, that person will not participate and a substitute will be appointed for that purpose.

The channel currently available is compliance@foodiverse.com, without prejudice to any other channels that Foodiverse may enable or update.



False reports made in bad faith may result in disciplinary or legal measures.

09

Validity, Review and Updates

Validity, Review and Updates

Following the principle of **'Tone at the Top', the update of this Code of Ethics** is approved by the Board of Directors and the Management Committee of Foodiverse and is in force as from its communication.

The Code will be reviewed periodically and updated where appropriate by the Compliance Officer and the Ethics and Conduct Committee to ensure its alignment with the evolution of Foodiverse, applicable regulations, identified risks, the sustainability strategy and best practices in corporate governance.

Foodiverse will **periodically promote its dissemination,** training and understanding at all levels of the organization.



10



Putting the Code into Practice

Putting the Code into Practice

Before acting, ask yourself:

- **Is it legal and does it comply with our internal policies?**
- **Is it consistent with Foodiverse's values and commitments?**
- **Does it protect food safety, quality and the trust of customers and consumers?**
- **Does it respect people, human rights and the environment?**
- **Could I explain it transparently to my team, to a customer, to a supplier or to an authority?**
- **Does it avoid conflicts of interest and protect Foodiverse's reputation?**

If the answer is not clear, stop and ask. You can contact your manager, the Compliance Officer, the Ethics and Conduct Committee or the reporting channel enabled for this purpose.

foodiverse

Driving the future of
Fresh Convenience
in Europe